

JESSE EDWARD WILES	:	NO. 21, 982 EQUITY
Route 1	:	
Woodsboro, Maryland	:	IN THE CIRCUIT COURT FOR
COMPLAINANT	:	FREDERICK COUNTY, IN EQUITY
vs.	:	
RUTH ELIZABETH WILES	:	
Route 1	:	
Thurmont, Maryland	:	
DEFENDANT	:	

* * * * *

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Jesse E. Wiles, by W. Jerome Offutt and E. Newton Steely, Jr., his Solicitors, respectfully shows unto your Honorable Court.

FIRST: That your Complainant and the Defendant, Ruth Elizabeth Wiles, are residents of Frederick County, State of Maryland.

SECOND: That by Deed dated December 9, 1949, Melvin E. Kauffman, unmarried, did grant and convey unto the Defendant, Ruth Elizabeth Wiles, and unto your Complainant, Jesse E. Wiles, who were then husband and wife, all that tract or parcel of land, situate, lying and being in Lewistown Election District, Frederick County, Maryland, being all that lot of land fronting on the road leading to the road from Mountindale to the Fish Hatchery and known as Adam Rice's right of way, which said deed is recorded in Liber 482, folio 95, one of the Land Records of Frederick County, Maryland, a copy of said deed being attached hereto and prayed to be taken as a part hereof, marked "Exhibit A" .

THIRD: That your Complainant and the Defendant were divorced A VINCULO MATRIMONII by a Decree of your Honorable Court, dated the 1st day of February, 1968, a copy of said Decree being attached hereto and prayed to be taken as a part hereof, marked "Exhibit B".

FOURTH: That your Complainant is informed and does thus aver that said Divorce transferred the ownership of said real estate from a tenancy by the entireties to a tenancy in common.

FIFTH: That the aforesaid real estate of which the Parties are seized and possessed is not susceptible to partition in kind; neither can it be divided between the Parties entitled thereto without loss or injury.

W. JEROME OFFUTT
ATTORNEY AT LAW
FREDERICK, MD.